UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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REGIONAL
ADMINISTRATOR'S
DIVISION

July 11, 2022

Christine Stevenson, Bremerton EIS Project Manager
Naval Facilities Engineering Systems Command Northwest
1101 Tautog Circle, Room 210
Silverdale, Washington 98315

Dear Christine Stevenson:

The U.S. Environmental Protection Agency has reviewed the Department of the Navy's June 2022 Notice of Intent to prepare an Environmental Impact Statement for the Bremerton Waterfront Infrastructure Improvements (EPA Project Number 22-0029-USN). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The Navy proposes to evaluate the potential environmental impacts associated with construction, modification, replacement, demolition, and operation of multiple waterfront infrastructure and facilities at the Puget Sound Naval Shipyard and Intermediate Maintenance Facility at Naval Base Kitsap Bremerton, Washington. The Navy has identified two preliminary action alternatives to carry forward for analysis in the Draft EIS along with the No Action alternative.

EPA has expertise in environmental issues, jurisdiction by law, and is currently involved in regulatory actions that may be affected by the proposed project. The proposed project is complex, with an intent to complete the Record of Decision by the Spring of 2024. EPA therefore encourages the Navy to designate EPA as a cooperating agency in developing this EIS to utilize EPA's technical expertise and assistance. Early engagement will help streamline federal decisions, ensure the EIS sufficiently assesses and characterizes impacts, and informs avoidance and mitigation measures. Lead agencies find EPA's early engagement to be useful, especially when working on projects with tight schedules.

EPA appreciates the information provided about the proposed project in the NOI and the June 29, 2022, interagency scoping meeting. EPA has concerns about the potential impacts from the project activities to Puget Sound Naval Shipyard Complex Superfund cleanup site, water and air quality, aquatic habitat impacts, environmental justice concerns and climate change impacts. EPA emphasizes the importance of continuing to engage early with agencies and tribal and state governments for feedback beyond project scoping. Enclosed are EPA's scoping comments on specific topics important to consider in this project's NEPA analysis.

Thank you for the opportunity to review the NOI for this project. If you have questions about this review, please contact Emily Bitalac of my staff at (206) 553-2581 and bitalac.emily@epa.gov, or me, at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu Digitally signed by Rebecca Chu
Date: 2022.07.11 13:32:12 -07'00'

Rebecca Chu, Chief
Policy and Environmental Review Branch

Enclosure

U.S. EPA Detailed Comments on the
Bremerton Waterfront Infrastructure Improvements NOI
Bremerton, Washington
July 2022

Aligning Infrastructure Improvements Project with each CERCLA Operable Unit

The project area is located within the Puget Sound Naval Shipyard Complex National Priorities List Superfund (CERCLA) site. Please be aware that EPA is actively involved in cleanup of this site, and we will continue those efforts. The Superfund site has six Operational Units (OU), each with their own cleanup plan known as a Record of Decision. Construction of the infrastructure improvements in the proposed alternatives and operation of the new drydock will impact the Superfund cleanup remedies of OU B Terrestrial and OU B Marine.

In light of these potential impacts to the Superfund cleanup activities, EPA recommends the Draft Environmental Impact Statement:

- Include details of the OU B Terrestrial and OU B Marine Superfund cleanup remedies in the "affected environment" section of the DEIS. Identify the contaminants that are the focus of the remediation as well as the remediation targets for each OU affected by the project.
- Discuss how the project will affect the cleanup remedy in the "environmental consequences" section of the DEIS. Examples of potential impacts: include degradation of pavement that serves as a cap for the Superfund remedy in OU B Terrestrial during construction, excavation of contaminated upland soil; dredging of contaminated sediment including sediment under piers that has not been previously addressed; and pumping and discharging contaminated groundwater during operation of the new drydock (a source control issue for OU B Marine).
- Including maps in the DEIS that clearly show the affected OUs and the areas and depths of dredging including any area beyond the OU B Marine boundary in Outer Sinclair Inlet. As described in the Dredged Sediment Testing and Disposal section, additional testing will likely be needed for sediments that may need to be dredged, both inside and outside these OUs.

The Superfund site project team includes Navy project managers, EPA, Washington Department of Ecology, the Suquamish Tribe, and Washington Department of Natural Resources. The team is currently working on a Focused Feasibility Study to assess alternatives for cleanup of mercury in OU B Marine sediment and refining our understanding of contaminant transport in the upland to the marine environment. The team is also updating the groundwater fate and transport model and the conceptual site model. Given this, it is encouraged that data collected or studies completed for the purposes of the proposed Infrastructure Improvement Project which impact the Superfund site cleanup activities be shared with the Superfund site team. Please coordinate with Anne Christopher, EPA's Remedial Project Manager for the Superfund cleanup. Anne can be reached at (503) 326-6554 or christopher.anne@epa.gov.

Dredged Sediment Testing and Disposal

Because the proposed project involves dredging sediments, including contaminated sediments under piers that have not been previously addressed, EPA recommends the DEIS discuss the options for management and disposal of the dredged material based on the sediment characterization results. If sediment suitability determinations cannot be made, presume that the material to be dredged will not be suitable for all placement options and identify how any toxic or contaminated material that does not meet disposal or placement criteria would be handled. Sediment testing and evaluation is required to determine suitability for open-water disposal. Please coordinate with Erika Hoffman, EPA's staff point

of contact for the Dredged Management Material Program. Erika can be reached at (360) 753-9540 or hoffman.erika@epa.gov.

Impacts to Water Quality and Aquatic Resources

Clean Water Act (CWA) Section 402

In Washington, EPA issues NPDES permits for federally-owned facilities and permits on tribal lands; EPA has delegated authority to issue other NPDES permits to the Washington Department of Ecology.[1] EPA recommends the DEIS identify any discharges to waters of the U.S. that are known, or are likely, to occur during construction and operation of the project and how these discharges would be managed and minimized. Identify the NPDES permits that will be obtained for the construction phase, new (or modifications to) existing permits for operations, and how any previous permit exceedances could be prevented by incorporating pollution prevention measures into the project.

CWA Section 404

The proposed project would require a permit under Section 404 of the CWA from the U.S. Army Corps of Engineers for the discharge of dredged or fill material into waters of the U.S. Wetlands, vegetated shallows, mud flats, cobble substrates and eelgrass and kelp beds are all considered special aquatic sites under the CWA Section 404(b)(1) Guidelines (40 CFR 230).

EPA recommends that the DEIS:

- Clearly identify any discharges to waters of the U.S. that are known, or likely, to occur that will be subject to Section 404 of the CWA. Identify and describe the impact of those discharges, control measures to be employed to address those impacts, and best management practices to prevent discharge of water and pollutants.
- Includes sufficient information that can serve as at basis to determine whether the project would satisfy the requirements for the Section 404 permit or identify appropriate measures to mitigate the project's impacts to all waters of the U.S.
- Structure the alternatives analysis so that it is consistent with meeting requirements of both the CWA and NEPA.
- Describe the regulatory criteria and processes utilized to screen potential alternatives and thoroughly evaluate alternatives that would pose less adverse impacts.
- Describe how compensatory mitigation will be quantified and provided to offset impacts, with specific project examples and options as available. The National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) Conservation Calculator is a tool that can be used to identify, evaluate and determine how much compensatory mitigation to provide for the different alternatives evaluated in the DEIS.

For context on the CWA Section 404(b)(1) analysis, the Guidelines include four main requirements (40 CFR 230.10 (a) through (d)):

Least Environmentally Damaging Practical Alternative (LEDPA) Determination - Section 230.10(a)

A Section 404 permit can be issued only for the LEDPA. Practicable alternatives include those that are capable and feasible of being done after taking into consideration costs, technology and logistics. Costs alone cannot make a project not practicable. Corps permit decisions require a comprehensive evaluation of the range of alternatives to ensure the permitted alternative is the LEDPA. Identification of the

[1] https://www.epa.gov/npdes-permits/washington-npdes-permits.

LEDPA is achieved by performing an alternatives analysis that estimates the direct, indirect, and cumulative impacts to jurisdictional waters of the U.S. that would result from each of the potential project alternatives. Only when this analysis has been performed can the applicant or the permitting authority be assured that no discharge other than the practicable alternative with the least impact on the aquatic ecosystem will be authorized. EPA recommends exploring all avoidance or minimization alternatives for all aspects of the proposed project. There may be avoidance or minimization opportunities in dry dock configuration, dredging, temporary lay down areas, dredge material placement, and beneficial use of clean material options, etc.

Water Quality - Section 230.10(b)
Prohibits permitting projects that would cause or contribute to violations of water quality standards, violates any applicable toxic effluent standard, jeopardizes continued existence of endangered or threatened species and impacts to critical habitat under the Endangered Species Act, or violates any requirements to protect any marine sanctuary designated under Marine Protection, Research, and Sanctuaries Act. Section 230.10(b) requires that a determination be made as to whether the project will cause a violation of water quality standards, during and after construction of the dry dock, turning basin, and any associated channel dredging. Discharges from temporary pier construction, dewatering of dredged materials, and sediment plumes from dredging activity may also impact water quality.

Significant Degradation - Section 230.10(c)
Prohibits permitting a project that causes or contributes to significant degradation of aquatic resources. Effects contributing to significant degradation include: (1) adverse effects on plankton, fish, shellfish, wildlife, and special aquatic sites (40 CFR 230.10(c)(1)), (2) adverse effects on life stages of aquatic life (40 CFR 230.10(c)(2)), (3) aquatic ecosystem diversity, productivity, and stability including loss of fish and wildlife habitat (40 CFR 230.10(c)(3)), and (4) impairment or destruction of endangered species habitat (40 CFR 230.30(2)).

Mitigation - Section 230.10(d)
Requires compensatory mitigation for unavoidable impacts to aquatic resource functions. The 2008 Joint EPA-Corps Federal Mitigation Rule (40 CFR 230.91-98) establishes a preference for compensatory mitigation based on a watershed approach, which can ensure that potential direct and indirect impacts of the project are offset. In addition to identifying all measures to avoid and minimize adverse impacts to the aquatic environment (showing compliance with 40 CFR Part 230.10(a)), for unavoidable impacts compensatory mitigation should be provided.

As previously noted, early engagement with the resource agencies in developing the NEPA analysis is encouraged to streamline regulatory processes. Early engagement with the resource agencies provides an opportunity for the Navy to receive guidance and direction about the nature and extent of concerns regarding the secondary and cumulative impact evaluation.

CWA Section 401
The CWA provides states and authorized tribes the authority to grant, deny, or waive certification of proposed federal licenses or permits that may discharge into waters of the U.S. This section of the CWA is an important tool for states and authorized tribes to help protect the water quality of federally regulated waters within their borders, in collaboration with federal agencies. In developing the DEIS, EPA recommends early coordination with the State, tribes that have treatment in a similar manner as a state and CWA 401 authority and EPA regarding CWA Section 401 for the purposes of streamlining regulatory processes.

CWA Section 303(d)
The CWA requires states to develop a list of impaired waters that do not meet water quality standards, establish priority rankings, and develop action plans called Total Maximum Daily Loads (TMDLs) to improve water quality. EPA recommends the DEIS include information on CWA Section 303(d) impaired waters in the project area and any efforts related to TMDLs. Discuss what effect, if any, project discharges may have on impaired waterbodies. Describe existing restoration and enhancement efforts for those waters, how the proposed project will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

Aquatic Habitat
EPA recommends the DEIS describe aquatic habitats in the affected environment (e.g., habitat type, plant and animal species, functional values, and integrity) and the environmental consequences of the proposed action on these resources. Evaluate impacts to aquatic resources in terms of the impacted acreage and by functions performed. Project construction, operation, and maintenance may affect a variety of aquatic resources. The project has potential to degrade habitat for fish and other aquatic biota, and these resources may experience varying degrees of impacts and alteration of their hydrologic functions. For any impacts that cannot be avoided through siting and design, describe the types, location, and estimated effectiveness of best management practices applied to minimize and mitigate impacts to aquatic resources. Consider cumulative impacts to recreational and subsistence fishers.

EPA also recommends coordinating with the U.S. Fish and Wildlife Service and NOAA/NMFS to devise the best possible mitigation plan to alleviate any noise impacts to aquatic species and birds from construction, operation, and maintenance.

Air Quality
EPA recommends the DEIS discuss the ambient air conditions (baseline or existing conditions), the National Ambient Air Quality Standards, and the potential air quality impacts of the project, from both construction and operations, for each fully evaluated alternative.

Provide an emissions inventory of criteria pollutants, greenhouse gas emissions, and hazardous air pollutant (HAP) emissions for all project components. Based on these estimates, indicate whether the additional HAP emissions would trigger thresholds for the facility to be categorized as a major source under National Emissions Standards for Shipbuilding and Ship Repair (40 CFR Part 63, subpart II) and/or would require a Title V permit.

Evaluate increased emission exposures from HAPs and fuel combustion resulting from the project. EPA recommends the DEIS discuss the cancer and noncancer health effects associated with air toxics and diesel particulate matter, identify nearby sensitive receptors, and indicate whether any populations that have environmental justice (EJ) concerns pursuant to Executive Order 12898 are nearby or on major trucking routes that could be impacted by truck emissions. EPA recommends the Navy evaluate and incorporate best management practices and mitigation measures into the DEIS project description to reduce emissions of criteria pollutants and HAPs, which also have the co-benefits of reducing GHGs.

Construction emissions
EPA recommends the DEIS also address potential air quality impacts during the construction period to reduce construction emissions. EPA suggests the following:

- Identify construction mitigation measures for dust control, indicate whether contaminated soils would be disrupted, and identify any precautions needed to manage dust due to potential contamination of surface soils during construction.
- Stabilize open storage piles and disturbed areas by covering or by applying water, chemical, or organic dust palliative where appropriate to both active and inactive sites to control fugitive dust sources
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions and control of fugitive dust.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors in the project area, such as daycare centers, schools, nursing homes, hospitals, and other health-care facilities, and minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.
- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Meet EPA diesel fuel requirements for off-road and on-highway, and, where appropriate, use alternative fuels such as natural gas and electric.[2]
- Include a commitment in the NEPA document to require, or provide contractor incentives to obtain, air quality construction mitigation measures to minimize construction-related emissions of air toxics and diesel particulates.

Coordination with Tribal Governments

EPA encourages the Navy to consult with the Tribes and incorporate feedback from the Tribes when making decisions regarding the project. EPA recommends the DEIS describe the issues raised during the consultations and how those issues were addressed, consistent with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments.*

National Historic Preservation Act

Puget Sound Naval Shipyard is listed as a National Historic Landmark.[3] Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate State Historic Preservation Office/Tribal Historic Preservation Office. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be disclosed in the DEIS. Section 106 of the NHPA requires that federal agencies consider the effects of their actions on cultural resources, following the regulation at 36 CFR 800.

EPA recommends the DEIS discuss how the project will avoid or minimize adverse effects on the physical integrity, accessibility, or use of cultural resources or archaeological sites, including traditional cultural properties (TCPs), throughout the project area. Discuss mitigation measures for archaeological sites and TCPs. EPA encourages the Navy to append any Memoranda of Agreements to the DEIS, after redacting specific information about these sites that is sensitive and protected under Section 304 of the NHPA. EPA also recommends providing a summary of all coordination with Tribes and with the State and Tribal Historic Preservation Offices, including identification of NRHP eligible sites and development of a Cultural Resource Management Plan.

[2] https://www.epa.gov/vehicles-and-engines.
[3] Christine Stevenson (Navy) – Personal Communication during June 29, 2022, Agency Scoping Meeting.

Pollution Prevention

As described previously, regulatory requirements associated with pollution preventions may apply to the proposed project (e.g., CWA permitting; existing Superfund cleanup plans; and Clean Air Act requirements). EPA therefore recommends including pollution prevention considerations in the early planning and decision-making processes for the proposed project, and, where appropriate, document those considerations in the DEIS.[4] EPA recommends the project be designed to incorporate structural source controls for pollution prevention and to address the pollution prevention from existing sources of contamination to the maximum extent. Specifically:

- Include process water collection and treatment as a component of the project. When designing the project's infrastructure, explore designs that capture and treat 100% process wash water if possible. Such a system could also possibly capture dry dock runoff from small storm events. Identify these features in the project description for the alternatives.
- When designing the project's infrastructure, explore designs that minimize or prevent stormwater from contacting industrial areas. Consider cover and containment options specific to industrial activities being conducted on the dry dock. For example, full tarping of vessels on the dry dock should be considered when pollutant generating activities are occuring (e.g., grinding/sanding, welding, painting).
- Incorporate these additional structural source controls features during project design to the maximum extent practicable: direct deck drainage to a collection system sump, implement diagonal trenches or berms and sumps to collect wash water, use solid decking, gutters, and sumps at lift platforms and collect wash water for possible reuse; enclose, cover, or contain blasting and sanding activities; cover drains, trenches, and drainage channels; enclose, cover, or contain painting activities; cover fueling areas; install covered areas where storage and handling of hazardous materials takes place.
- Address ongoing sources of pollution in or near the project area to the extent possible. Consider using the construction work associated with the project to advance the work needed to address ongoing issues.

Noise

EPA recommends that the DEIS evaluate and address potential noise impacts of the proposed project by:

- Describing how residents living in the vicinity of the proposed facility will be engaged throughout the planned construction activities and establish procedures for complaints investigation.
- Describing a noise monitoring program. Consider establishing baseline noise before beginning construction and designing noise monitoring to assess impacts of noise to workers and adjacent communities in the vicinity of the project and to verify that actual noise levels do not exceed maximum predicted levels.
- Analyzing the potential increase in noise associated with the project and implement best practices for acoustic shielding (i.e., strategic positioning of non-noise generating equipment) and other noise reduction techniques (e.g., mufflers, enclosures, curtains, insulation, and vegetative barriers, and minimizing engine idling during construction and operation).
- Identifying sensitive receptors near the project area and consider noise as an EJ concern.

[4] https://www.energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/G-CEQ-PollutionPreventionNEPA.pdf.

Large industrial facilities produce mechanical noise and vibrations during operation. Daily operations as well as construction have the potential to produce noise levels exceeding 60 dBA, exceeding the general protective criterion of 55 dBA. Chronic exposure to noise at this level is associated with adverse health outcomes, including sleep disturbance, hypertension, and cardiovascular disease. Commonly used construction equipment has the potential to generate noise well above 55 dBA, which has the potential to create cumulative impacts.

Environmental Justice

Executive Order 12898 directs federal agencies to identify and address the disproportionately high and adverse human health on environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. EO 13985 on *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* should also be incorporated to the Navy's analysis since it includes a modern definition of equity that clarifies a broader approach.

Assessing EPA's Environmental Justice Screening and Mapping Tool (EJScreen) information is a useful first step in understanding or highlighting locations that may be candidates for further review or outreach.[5] EPA considers a project to be in an area of potential EJ concern when an EJScreen analysis for the impacted area shows one or more of the eleven EJ Indexes at or above the 80th percentile in the nation and/or state. At a minimum, EPA recommends an EJScreen analysis consider EJScreen information for the block group(s) which contains the proposed action(s) and a one-mile radius around those areas.

It is important to consider all impacted areas by the proposed action(s). Areas of impact can be a single block group or span across several block groups and communities.[6] When assessing large geographic areas, consider the individual block groups within the project area in addition to an area wide assessment. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators.[7] As the screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location and/or proposed project, consider additional information in an EJ analysis to supplement EJScreen outputs. Further review or outreach may be necessary for the proposed action(s). To address these potential concerns, EPA recommends:

- Applying methods from "Environmental Justice Interagency Working Group Promising Practices for EJ Methodologies in NEPA Reviews" report, or the Promising Practices Report, to this project.[8] The Promising Practices Report is a compilation of methodologies gleaned from current agency practices concerning the interface of EJ considerations through NEPA processes.
- Characterizing project site(s) with specific information or data related to EJ concerns.[9]
- Describing potential EJ concerns for all EJ Indexes at or above the 80th percentile in the state and/or nation.

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[5] https://ejscreen.epa.gov/mapper/.

[6] Agencies should define community as "either a group of individuals living in geographic proximity to one another, or a geographically dispersed set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions" (Interim Justice40 Guidance – Executive Order 14008 on Tackling the Climate Crisis at Home and Abroad, January 27, 2021).

[7] https://www.epa.gov/ejscreen/technical-documentation-ejscreen.

[8] https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf.

[9] For more information about potential EJ concerns, refer to the July 21, 2021 Memorandum for the Heads of Departments and Agencies Interim Implementation Guidance for the Justice40 Initiative. https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf.

- Describing block groups which contain the proposed action and at a minimum, a one-mile radius around those areas.
- Describing individual block groups within the project area in addition to an area-wide assessment.
- Supplementing data with county level reports and local knowledge such as Washington's Environmental Health Disparities mapping tool.[10]

Impacts of Climate Change
EPA recommends the DEIS consider ongoing and projected regional and local climate change and ensure robust climate resilience/adaption planning in the project design. EPA also recommends the DEIS include measures to be taken to ensure resilience/adaptation to protect the infrastructure investment from the effects of climate change (on the project). The long-lived nature of infrastructure makes consideration of the ongoing and projected impacts of climate change even more important. It is not sufficient to ensure resilience of the project to risks under current climate conditions. Considering potential climate change impacts helps ensure that investments made today continue to function and provide benefits, even as the climate changes.

EPA recommends that the DEIS specifically discuss how climate resiliency has been considered in the design of the proposed action and alternatives, and related measures should be discussed and included, as appropriate, in the conclusion and recommendations section. This, and consideration of any relevant state, tribal, or local adaptation plans, enables consideration of ongoing and projected regional and local climate impacts, including, but not limited to, rising sea levels, drought, high intensity precipitation events, at-risk areas not yet designated as flood zones, and increased fire risk. Consideration of these impacts helps avoid infrastructure investments in vulnerable locations, and unintended impacts on local communities.

Endangered Species Act
EPA recommends the DEIS identify any endangered, threatened, and candidate species under the ESA, and other sensitive species within the project area and vicinity. Describe the critical habitat for the species; identify any impacts construction, operation, and maintenance of the proposed project would have on the species and their critical habitats; and explain how the proposed program will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service (USFWS) and NOAA/NMFS. Please note that if impacts to listed species are significant, a biological assessment and a description of outcomes of ESA consultation with the NOAA/NMFS and USFWS may be required. EPA recommends that the DEIS discuss how the proposed project will contribute to the recovery of listed or declining species, including candidate for listing species, sensitive, and other species of concern Federal or State fish and wildlife agencies.

Cumulative Effects
Cumulative effects are those that are reasonably foreseeable, related to the proposed action under consideration, and subject to the agency's jurisdiction and control. EPA recommends that the DEIS analysis consider evaluation of impacts over the entire area of impact and consider the effects of projects when added to other past, present, and reasonably foreseeable future projects in the analysis area. Considering all the actions in this area together would help decision makers to understand more clearly what the cumulative impacts on environmental resources are likely to be and identify ways to ensure the project is sustainable. EPA has issued guidance on how to provide comments on the assessment of

[10] https://fortress.wa.gov/doh/wtn/WTNIBL/.

cumulative impacts, *Consideration of Cumulative Impacts in EPA Review of NEPA Documents.*[11] The guidance states that to assess the adequacy of the cumulative impact assessment, there are five key areas to consider:

- Resources, if any, that are being cumulatively impacted.
- Appropriate geographic area and the time over which the effects have occurred and will occur.
- All past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern.
- A benchmark or baseline.
- Scientifically defensible threshold levels.

Monitoring

As the proposed project has the potential to impact many environmental resources for an extended period, EPA recommends that the project be designed to include an monitoring program to ensure compliance with and efficacy of mitigation measures. EPA recommends the DEIS describe the monitoring program and how it will be used as an effective feedback mechanism so that the project can be adaptively managed over time, and any needed adjustments can be made to the project to meet environmental objectives throughout its lifespan.

[11] https://www.epa.gov/sites/production/files/2014-08/documents/cumulative.pdf.